

FILED

September 20, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: _____ **CC**
DEPUTY

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JUSTIN X. HALE §
Plaintiff, §
§
V. § **CASE NO. 1:2024cv01076**
§
JAMIE MCGREGOR, DIRECTOR OF §
TRAINING & EDUCATION USA RUGBY §
AND §
USA RUGBY §
Defendants. §

PLAINTIFF'S AMENDED COMPLAINT

COMES NOW, Plaintiff Justin X. Hale, who files this amended complaint against Defendants Jamie McGregor and USA Rugby seeking monetary, injunctive, and declaratory relief for their tortious interference, retaliation, and defamation. In support thereof, Plaintiff respectfully submits the following:

I. INTRODUCTION

1. Plaintiff Justin X. Hale (Hale), based in Hutto, TX, became a rugby referee in 2017, following a successful playing career as a Division 1 athlete in both 7s and XVs rugby. As he transitioned from player to referee, Hale quickly gained recognition, officiating over 30 matches per year in the early stages of his career. Soon senior referees advised him that continuing to play could hinder his advancement as a referee in the eyes of decision-makers, so by 2020, he shifted his

focus entirely to refereeing and coaching. This transition led to more opportunities, and by 2021 he refereed in his first championship series through National Collegiate Rugby (NCR).

2. In 2021, Hale was accepted into the USA Rugby Regional Development Group (RDG), composed of the top 100 referees in the country, where the focus is on identifying and advancing referees with potential for higher-level competitions. RDG members are selected based on their foundational skills, commitment to development, and willingness to take on regular assignments. The goal of the RDG is to maintain equitable representation across regions and support referees' progression through the Pathways program. The same year he was also appointed as an Assistant Referee for the USA Rugby Club XV's National Championship.
3. By 2022, Hale's skills had earned him his first national championship assignment as the lead match official for USA Rugby D1AA National Championship.. He was also invited to officiate at the Collegiate Rugby Championships in New Orleans, the largest and most prestigious collegiate 7s championship in the nation. Due to his standout performance, he was selected as an Assistant Referee (AR) for Rugbytown 7s, the most notable professional 7s competition in the U.S, competition he had played in multiple times, but always wanted to participate in as a match official. There, he became the first AR to be appointed as the lead match official for the honored Military Final. Additionally, Hale was invited to serve as the lead match official for the NCR XV's National Championship as well as the USA Rugby Club 7s National Championship, and the USA Rugby Collegiate National Championships (CRAA).

4. In 2023, Hale was brought into Major League Rugby (MLR), the highest professional rugby league in the United States, as an Assistant Referee (AR), where he was appointed to 10 matches in his first season and recognized as one of the top emerging ARs. During this year, he fully dedicated himself to officiating, covering over 215 matches, including 135 as the lead Match Official, traveling over 12,000 miles by car and flying nearly 20,000 miles. His dedication and investment, totaling nearly \$10,000, significantly enhanced his refereeing skills and expertise. Hale was also invited by Nick Ricono, the USA Rugby 7s Referee Manager, to be a part of the HSBC 7s official match referee crew. This event is the highest level of 7s competition in the world that helps to determine teams for Olympic competition.
5. Notably, Hale has been selected to referee prestigious competitions both domestically and internationally, including the USA 7s Men's and Women's Olympic Trials (2024), Canada Women's 7s (2024), Japan Men (2023/2024), Coral Coast 7s in Fiji (2024), Rugbytown 7s in Denver(2022-2024), the USA Club XVs National Championship (2021), Major League Rugby (2023), and Papeete International 7s (2024).
6. In addition, Hale serves as the Regional Development Officer (RDO) for his local union, overseeing training and development of referees. As a member of the referee community, Hale also coaches youth and adult rugby players. He was also selected by USA Rugby in 2023 to lead a two-day Assistant Referee course for both RDG and NDG (National Development Group) members, as well as a Referee Coach for National Intercollegiate Rugby Association (NIRA).

His commitment to refereeing excellence has allowed him to officiate at the highest levels of the sport.

7. Defendant Jamie McGregor is the Director of Training & Education at USA Rugby National Office, his office is in Denver, Colorado, and can be served at 2655 Crescent Dr., Lafayette, CO 80026. He can be reached at (720) 322-3114 and jmcgregor@usa.rugby
8. Defendant USA Rugby Corporation based in Colorado, with its principal place of business at 2655 Crescent Dr., Lafayette, CO 80026. USA Rugby can be served through its registered agent, A Registered Agent, Inc. at 8 The Green, Ste A, Dover, DE 19901.
9. Additional relevant parties within USA Rugby may include College Rugby Association of America (CRAA) and Major League Rugby (MLR).

II. JURISDICTION

10. This court has jurisdiction over the matter based on the diversity of citizenship between Plaintiff and Defendants. Plaintiff is a resident of Texas, and the Defendants primary office is in Colorado.

III. STATEMENT OF FACTS

11. Plaintiff Justin X. Hale is an experienced rugby referee affiliated with the Lonestar and Texas Rugby Referee Associations, two certified Local Referee Organizations.
12. Hale is a 1099 independent contractor with extensive experience in refereeing for Major League Rugby (MLR) and other competitions throughout the United States and abroad.

13. From April 28-30, 2023, Hale participated as a referee at the Collegiate Rugby Championships (“CRCs”) in Washington, D.C., an opportunity to officiate high-level matches and advance his refereeing career.
14. The CRCs are a national championship level rugby tournament for collegiate rugby organized and operated by National Collegiate Rugby (“NCR”).
15. NCR operates as a parallel collegiate rugby association to the Collegiate Rugby Association of America (CRAA). CRAA is recognized by Defendant USA Rugby.
16. On March 18, 2023, Hale was invited to participate as a referee at the CRAA 7s Championship. *See Exhibit A.*
17. On May 1, 2023, following his participation in the CRCs, Hale was informed by phone that he had been disqualified from participating as a referee at the CRAA 7s Championship due to his participation in the CRCs. *See Exhibit B.*
18. The CRAA excluded Hale from participation as a referee at the CRAA 7s Championship, in Houston, TX based on malicious, and false statements of fact communicated to them by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby.
19. Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, had actual knowledge that the statements communicated to CRAA were malicious, false and made with reckless disregard for the truth.
20. This decision was communicated by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, and did not provide Hale an opportunity to appeal the decision or otherwise address the matter.

21. On March 15, 2024, Hale emailed David Wilkerson, Head Referee Manager for Major League Rugby (MLR). *See Exhibit C.*
22. MLR is a professional rugby league, with teams based in the United States and Canada.
23. On March 15, 2024, in response to Hale's email, he was told that he could not be appointed to MLR matches until he "spoke to Jamie."
24. Hale was thus excluded from participating as a referee in MLR matches based on malicious and false statements of fact communicated to them by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby.
25. Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, had actual knowledge that the statements he communicated to MLR were malicious, false and acted with reckless disregard for the truth.
26. On March 25, 2024 Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, informed Hale through a Zoom video call, witnessed by Marquise Goodwin, Hale was not being selected to be in the MLR, because of his participation in the CRCs and other "high-profile" NCR events.
27. From April 25-28, 2024, Plaintiff Justin X. Hale participated in the 2024 CRCs.
28. From June 20-22, 2024, Plaintiff Justin X. Hale was invited by Marquise Goodwin to officiate scrimmages for the USA 7s Men, USA 7s Women, Canada 7s Women, and Japan 7s Men, as they prepared for the 2024 Olympics in Paris. Hale officiated matches and also coached/reviewed a high-profile USA Rugby referee. Hale traveled and made accommodations using his own funds.

29. On July 1, 2024, Nick Riconno, the Head Referee Manager for USA Rugby 7s competitions, acting on behalf of and at the direction of USA Rugby, informed Hale that he was not selected for Club National 7s 2024 due to his lack of complying with management directive “*even if we don't agree with them.*” This statement was made in reference to Hale’s participation as a referee at the CRCs and other NCR events. *See Exhibit D.*

30. Thus, Hale was excluded from refereeing as a referee at Club National 7s 2024 based on false statements communicated to Nick Riconno by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby.

31. Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, had actual knowledge that the statements he communicated to Nick Riconno were malicious, false and made with reckless disregard for the truth.

32. As a result of the multiple acts of malicious, false, and reckless behavior of Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, Hale was denied other significant refereeing opportunities, including the Texas D1 High School Championship, the USA Club Regionals in Orlando, and MLR appointments.

33. Denial of these opportunities has caused concrete financial loss, significant emotional distress, and professional setbacks.

IV. LEGAL CLAIMS

Tortious Interference:

34. Plaintiff Justin X. Hale asserts that Defendant Jamie McGregor actions, acting on behalf of and at the direction of USA Rugby, constituted tortious interference with contractual

relationships and prospective business opportunities, causing substantial damage to Plaintiff's reputation and career prospects.

- a. **Existence of a Valid Contract or Business Expectancy:** Plaintiff, Justin X. Hale, had valid contracts and business expectations with various rugby organizations, including the Collegiate Rugby Association of America (CRAA) and Major League Rugby (MLR), for officiating assignments. These contracts and expectations provided Plaintiff with legal rights to officiate at significant rugby events and competitions.
- b. **Defendant's Knowledge:** Defendant Jamie McGregor, in his role as Director of Training & Education at USA Rugby, was aware of Plaintiff's professional engagements and the existing contracts with the aforementioned organizations. His position afforded him knowledge of the impact his actions would have on Plaintiff's professional opportunities.
- c. **Intentional Interference:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, intentionally interfered with Plaintiff's Justin X. Hale potential contracts and business opportunities by communicating malicious and misleading information about Hale's participation in events. This interference included unjustly disqualifying Hale from the CRAA7s Championship and hindering his ability to officiate in Major League Rugby matches. These actions were executed with the intent to disrupt and undermine Plaintiff's professional assignments and future career prospects.

- d. **Lack of Justification:** The interference by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, lacked justification and was not based on any lawful or reasonable grounds. The actions taken were arbitrary and retaliatory, aimed at penalizing Plaintiff for his participation in certain events and not related to any legitimate organizational policies or rules.
- e. **Harm:** As a direct result of Defendant Jamie McGregor's interference, acting on behalf of and at the direction of USA Rugby, Plaintiff lost significant refereeing opportunities, including high-profile events such as the College Rugby Championships, Texas High School Rugby Championships, and Major League Rugby appointments. This loss resulted in substantial financial damages and reputational harm, affecting Hale's career advancement and income.

Retaliation:

35. Plaintiff Justin X. Hale claims retaliation by Jamie McGregor and USA Rugby for participating in the Collegiate Rugby Championships, leading to exclusion from multiple professional opportunities and harm to Plaintiff's career.

- a. **Protected Activity:** Plaintiff Justin X. Hale participation in the Collegiate Rugby Championships (CRCs), which is sanctioned by a different governing body, is a protected activity. This event was legitimate and recognized by its governing body, even though it was not under the purview of USA Rugby.
- b. **Adverse Action:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, took adverse actions against Plaintiff by disqualifying him from

participating in USA Rugby events and interfering with his assignments with other rugby organizations. These actions included informing Hale that he would not be appointed to Major League Rugby matches and was excluded from other high-profile events, such as the Collegiate Rugby Championships, unless Hale ceased to participate in high-profile NCR events.

- c. **Causal Connection:** There is a causal link between Plaintiff Justin X. Hale's participation in the CRCs and the adverse actions taken by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby. The timing and nature of the adverse actions—such as being barred from refereeing at events and losing professional opportunities—demonstrate a direct connection to Plaintiff's involvement in the CRCs. The retaliatory actions were executed specifically after Plaintiff's participation in these sanctioned events, illustrating that the adverse actions were in response to Plaintiff's protected activity.

- d. **Intimidation and Coercion:** Jamie McGregor, acting on behalf of and at the direction of USA Rugby, made threats of removing Plaintiff from future events if Plaintiff participated in NCR-affiliated matches. This coercive behavior amounts to intimidation, with the intent to control Plaintiff's officiating opportunities and silence him through fear of continued career damage.

Defamation:

- 36. Plaintiff Justin X. Hale, alleges that Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, made false statements of fact with actual malice about Plaintiff's to

CRAA and others resulting in Plaintiff's unlawful exclusion from professional rugby events and opportunities due to Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, made damaging Hale's reputation, breaching Hale's rights, and undermining Hale's professional standing and earning potential.

- a. **False Statement:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, made malicious and false statements about Plaintiff, Justin X. Hale, regarding his participation in rugby events and his qualifications as a referee. These statements were presented as factual rather than opinions.
- b. **Publication:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, communicated these false statements to third parties, including officials from Major League Rugby and other rugby organizations, effectively disseminating the misinformation within the rugby community.
- c. **Fault:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, acted with at least negligence by making these statements without verifying their accuracy. His role as Director of Training & Education at USA Rugby required him to adhere to standards of truthfulness and professionalism.
- d. **Damages:** As a result of Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, defamatory statements, Plaintiff's suffered significant harm, including loss of refereeing opportunities, reputational damage, and financial losses. The statements negatively impacted Plaintiff's career prospects and standing within the rugby community.

Breach of Contract:

37. Plaintiff Justin X. Hale asserts that Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, constituted a breach of contract, causing significant harm to Plaintiff's professional opportunities and financial well-being.

- a. **Existence of a Valid Contract:** Plaintiff Justin X. Hale had valid contracts with rugby organizations, including Major League Rugby (MLR) and Collegiate Rugby Championships (CRCs), for officiating assignments. These contracts included clear terms regarding the scope of assignments and the obligations of both parties.
- b. **Plaintiff Upheld Their Legal Obligation:** Plaintiff Justin X. Hale fulfilled all contractual obligations under these agreements. This includes attending scheduled events, adhering to professional standards, and performing duties as required by the contracts.
- c. **Defendant Failed to Perform:** Defendant Jamie McGregor through his actions as Director of Training & Education at USA Rugby, interfered with these contracts by communicating misleading information and unjustly disqualifying Plaintiff's from rugby events. This interference prevented Plaintiff from fulfilling contractual assignments with MLR and CRCs, among others.
- d. **Plaintiff Sustained Injuries as a Result of the Breach:** As a direct result of Jamie McGregor's breach, acting on behalf of and at the direction of USA Rugby, Plaintiff suffered significant financial and reputational harm. This includes the loss of refereeing

opportunities and subsequent financial losses and damage to Plaintiff's career prospects.

Violation of the Ted Stevens Act:

38. Plaintiff asserts that Defendant Jamie McGregor's, acting on behalf of and at the direction of USA Rugby, violated the Ted Stevens Olympic and Amateur Sports Act by failing to adhere to procedural requirements, resulting in significant harm to Plaintiff's career and emotional well-being.

a. **Misapplication of Authority:** Defendant Jamie McGregor, in his capacity as Director of Training & Education at USA Rugby, acted beyond his statutory authority by unilaterally interfering with the sanctioning and participation of rugby events. His actions, including the removal of officials from events, directly contradicted the responsibilities and powers outlined under §220523 of the Ted Stevens Act. This section grants national governing bodies the authority to represent the U.S. in international sports federations, sanction competitions, and coordinate athletic activities. McGregor's interference not only disrupted the legitimate operations of sanctioned events but also undermined the proper application of these authorities, demonstrating a breach of his official duties.

b. **Failure in Communication:** Plaintiff Justin X. Hale was denied due process as outlined in §220524 of the Ted Stevens Act. This section mandates national governing bodies to ensure effective communication and provide due process to athletes. Plaintiff was removed from events without being provided written instructions or a clear

process to rectify the situation. The lack of due process, coupled with insufficient communication regarding the reasons for removal and steps to appeal or address the matter, constitutes a breach of the Act's requirements.

- c. **Impact on Participation:** Defendant Jamie McGregorgs actions, acting on behalf of and at the direction of USA Rugby, led to Plaintiff's exclusion from high-profile rugby events, including the College Rugby Association of America Championships, Club Rugby Championships, and Major League Rugby. These events are prominent within the U.S. rugby community, featuring top-level competition and attracting the attention of evaluators and other opportunities. Exclusion from these events has significantly impacted Plaintiff's professional visibility, career advancement, and ability to secure future refereeing opportunities.
- d. **Non-Compliance with Safe Sport Requirements:** Under §220525, national governing bodies are required to maintain a safe and fair environment and promptly report any allegations of abuse. While this section primarily addresses the prevention of abuse and safe sport practices, any deviation from these principles by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby,—such as failing to uphold fair treatment and procedural fairness—reflects a broader failure in upholding the statutory requirements. Defendant Jamie McGregor's actions contributed to an unsafe and unjust environment for Plaintiff, further exacerbating the harm experienced.

Discriminatory Treatment:

39. Plaintiff Justin X. Hale asserts that Defendant Jamie McGregor actions, acting on behalf of and at the direction of USA Rugby, constitute discriminatory treatment based on Plaintiff's participation in NCR events. The following elements support this claim:

- a. **Protected Activity:** Plaintiff's First Amendment right to freedom of association, exercised through participation in NCR events, such as the Collegiate Rugby Championships (CRCs), is the protected activity in this claim. Plaintiff's engagement in these events is a legitimate professional pursuit within the rugby officiating community.
- b. **Adverse Action:** Plaintiff Hale was removed from various USA Rugby events, including but not limited to the CRAA 7s Championship, Major League Rugby (MLR) matches, and Club National 7s 2024. These actions adversely affected Plaintiff's career and professional opportunities.
- c. **Discriminatory Intent or Motive:** The differential treatment is evidenced by recordings and communications from Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, indicating that Plaintiff's removal from events was due to his participation in NCR events. This treatment is not uniformly applied, as other referees, including those within MLR and CRAA 7s, have continued to participate in high-profile NCR and been appointed and promoted within the USA Rugby organization and events without facing similar adverse actions. This disparity suggests discriminatory intent or motive in Plaintiff's case.

d. **Causal Connection:** There is a clear causal connection between Plaintiff Justin X. Hale participated in NCR events and the adverse actions taken by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby. Video evidence and recordings show that the decisions to exclude Plaintiff from USA Rugby or MLR events were directly linked to his involvement in NCR events. This connection demonstrates that the removal was a result of Plaintiff's professional activities rather than any other legitimate reason.

e. **Unlawfulness of the Discriminatory Action:** The discriminatory treatment by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, violates the First Amendment, and has resulted in a disparate impact to Plaintiff. Plaintiff was removed from and prohibited from participating in events, while other referees similarly situated, including those with similar NCR involvement, were not penalized and in fact were promoted and appointed to high-profile positions with the USA Rugby structure, constituting unlawful discrimination. Defendant Jamie McGregor's actions, acting on behalf of and at the direction of USA Rugby, lack a legitimate, non-discriminatory basis and reflect an arbitrary and retaliatory motive.

f. **Failure to Provide Legitimate Justification:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, has failed to provide a legitimate, non-discriminatory justification for Plaintiff Justin X. Hale's removal from the events. Other referees with comparable NCR participation were not subjected to similar

penalties, further highlighting that the adverse actions against Plaintiff are unjustified and discriminatory.

Intentional Infliction of Emotional Distress:

40. Plaintiff Justin X. Hale asserts that Defendant Jamie McGregor, acting in his official capacity at USA Rugby, has engaged in a pattern of conduct that meets the criteria for Intentional infliction of Emotional Distress (IIED).

- a. **The Defendant Acts:** Defendant Jamie McGregor in his capacity as Director of Training & Education at USA Rugby, engaged in a series of deliberate actions that have directly impacted Plaintiff Justin X. Hale. Defendant Jamie McGregor's conduct included making malicious and false statements about Plaintiff's qualifications and participation in rugby events, resulting in significant interference with Plaintiff professional opportunities.
- b. **The Defendant's Conduct is Outrageous:** Defendant Jamie McGregor's actions, acting on behalf of and at the direction of USA Rugby, constitute outrageous and extreme conduct by any standard. His systematic efforts to remove Plaintiff from prestigious rugby events—such as the College Rugby Association of America Championships, the Club Rugby Championships, and Major League Rugby—reflect a calculated attempt to undermine Plaintiff Hale's career. This conduct is not only unprofessional but is designed to harm Plaintiff reputation and career prospects. Defendant Jamie McGregor's actions, acting on behalf of and at the direction of USA

Rugby, go beyond mere criticism or professional disputes and enter the realm of conduct that a reasonable person would find intolerable and unacceptable.

c. **The Defendant Acts Purposely or Recklessly:** Defendant Jamie McGregor's actions, acting on behalf of and at the direction of USA Rugby, were executed with either malice, the intention to cause harm and with reckless disregard for the consequences. Evidence indicates that McGregor deliberately communicated false information to rugby organizations about Plaintiff's involvement in sanctioned and unsanctioned events. Despite knowing the potential impact of his actions, Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, proceeded with his interference, demonstrating a blatant disregard for the professional and emotional well-being of Plaintiff.

d. **Emotional Distress is Severe:** As a direct result of Defendant Jamie McGregor's conduct, acting on behalf of and at the direction of USA Rugby, Plaintiff Justin X. Hale has suffered severe emotional distress. The distress includes, but is not limited to:

i. **Psychological Impact:** Plaintiff Hale has experienced significant anxiety, depression, and sleep disturbances. The stress of being unjustly removed from high-profile events has negatively impacted Plaintiff's mental health and overall quality of life.

ii. **Personal and Professional Impact:** The emotional distress has affected Plaintiff Hale daily life and relationships. The continuous threat of unjust removal and the need to hear from peers about Defendant Jamie McGregor's

actions, acting on behalf of and at the direction of USA Rugby, have exacerbated Plaintiff's distress, causing feelings of humiliation and frustration.

iii. **Professional Setbacks:** Plaintiff Justin X. Hale's career has been substantially harmed due to the loss of refereeing opportunities and damage to professional reputation. The inability to officiate at major events, which are critical for career advancement, has led to financial losses and hindered Plaintiff's career development.

e. **Causal Connection:** There is a direct causal link between Defendant Jamie McGregor's, acting on behalf of and at the direction of USA Rugby, outrageous conduct and the emotional distress suffered by Plaintiff Justin X. Hale. Defendant Jamie McGregor's deliberate interference, malicious, and false statements led to Plaintiff's exclusion from significant rugby events and have directly caused the severe emotional distress Plaintiff now endures. The nature and timing of Defendant Jamie McGregor's actions, coupled with the adverse consequences they produced, illustrate that Plaintiff's distress was a foreseeable result of Defendant Jamie McGregor's conduct.

41. Disparate Treatment Based on Race

a. Plaintiff Justin X. Hale asserts that Defendant Jamie McGregor's actions, acting on behalf of and at the direction of USA Rugby, constitute disparate treatment based on Plaintiff's race, in violation of anti-discrimination laws. As a Black-American male,

Plaintiff was subjected to discriminatory treatment compared to his domestic and foreign peers in similar professional settings.

- i. **Protected Class Status:** Plaintiff Justin X. Hale, a Black male, belongs to a protected class under federal and state anti-discrimination laws. His race is a protected characteristic that prohibits despair treatment based on race in professional opportunities.
- ii. **Adverse Actions:** Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, subjected Plaintiff to several adverse actions. These actions included, but were not limited to, the removal from officiating assignments such as the College Rugby Association of America (CRAA) 7s Championship 2023, Major League Rugby (MLR) matches 2024, and the Club National 7s 2024. These actions resulted in significant career setbacks and lost opportunities for Plaintiff.
- iii. **Discriminatory Intent or Motive:** The differential treatment between Plaintiff and his white peers establishes discriminatory intent. Plaintiff can demonstrate that multiple other referees, all of whom are white, participated in the same rugby events and were not reprimanded or disqualified. Instead, these referees were allowed to participate as match officials or assistant referees (ARSs), promoted within the USA Rugby leadership ranks, and appointed to high-profile officiating positions within USA Rugby. This stark contrast in disparate treatment between Plaintiff and his white peers indicates a racially

discriminatory motive behind Defendant Jamie McGregor's actions, which were carried out on behalf of and at the direction of USA Rugby.

iv. Casual Connection: There is a direct causal connection between Plaintiff's race and the adverse actions taken by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby. Despite performing at or above the same level as his white peers, Plaintiff was excluded from events. This pattern of differential treatment strongly suggests that the Plaintiff's race was a motivating factor in his exclusion from officiating assignment, further compounding the damage to his career.

v. Unlawfulness of Discriminatory Actions: The actions undertaken by Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, violate anti-discrimination laws, including Title VII of the Civil Rights Act of 1964, which prohibits racial discrimination in employment and professional opportunities. Plaintiff was unjustly removed from prestigious officiating roles and denied opportunities for career advancement, while white referees with similar or less experience and who participated in the same competitions as the Plaintiff, were promoted. This pattern of favoritism demonstrates unlawful racial discrimination.

vi. Lack of Justification: Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby, has failed to provide a legitimate, non-discriminatory reason for Plaintiff's exclusion from refereeing

opportunities. Other referees who participated in similar events were not penalized. The absence of justification highlights the discriminatory nature of the actions taken against Plaintiff.

vii. **Harm:** As a direct result of Defendant Jamie McGregor's discriminatory actions, acting on behalf of and at the direction of USA Rugby, Plaintiff has suffered significant professional and emotional harm. This includes the loss of refereeing opportunities, reputational damage, financial losses, and emotional distress. Plaintiff's career advancement was significantly hindered by his exclusion from major rugby events.

V. PRAYER FOR RELIEF

42. Plaintiff Justin X. Hale respectfully requests the following relief:

- a. **Compensatory Damages:** \$250,000 for loss of income, emotional distress, and reputational harm.
- b. **Consequential and Restitutionary Damages:** Compensation for any additional financial losses, career setbacks, and other consequences resulting from Defendants' discriminatory actions.
- c. **Professional Development Costs:** Compensation for expenses related to maintaining or advancing Plaintiff's refereeing certification and training.

d. Career Rehabilitation Costs: Compensation for expenses related to repairing Plaintiff's professional reputation, including public relation services or career counseling.

e. Compensation for Lost Training Opportunities: Award damages for the professional training and development opportunities lost due to the exclusion from officiating in MLR and other events. This includes costs related to attending training programs, workshops, and other professional development activities that Plaintiff was unable to pursue.

f. Professional Development Opportunities: Order Defendants to fund and facilitate Plaintiff Justin X. Hale's in a comprehensive professional development and training program to compensate for the lost opportunities to the actions of the Defendants.

This should include:

i. Major Training Programs: Enrollment in prestigious rugby training programs and workshops globally, including but not limited to advanced officiating certifications and high-level referee clinics.

ii. International Competitions: Participation in significant international rugby events and competitions as match official and assistant referee, to restore professional experience and visibility in the rugby community.

iii. Training Expenses: Defendants should cover all associated costs, including travel, accommodations, car rental, registration fees, and any other expenses related to attending these training programs and competitions.

g. **Long-Term Professional Impact:** Damages for the long-term impact on Plaintiff's career trajectory.

h. **Restoration of Professional Standing:** Request that Plaintiff be reinstated to his previous status or position within relevant organization, events, and competitions where applicable.

i. **Acknowledgment of Unfair Treatment:** Plaintiff seeks a formal acknowledgment from Defendants regarding the unfair treatment and its impact on Plaintiff's career.

j. **Public Apology:** Require Defendant Jamie McGregor and USA Rugby to issue a public apology addressing the wrongful actions and the harm caused. This apology should be distributed to all members and posted on all platforms, including but not limited to all social media accounts managed by USA Rugby and its affiliates, such as Facebook, Instagram, Rugby Xplorer, and all mailing lists.

k. **Punitive damages:** Punitive damages in an amount to be determined at trial to punish Defendants for their egregious conduct and deter similar behavior in the future.

l. **Injunctive Relief:**

i. **Prohibition of Engagement:** Enjoin Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby from future activities related to rugby refereeing, officiating, or training, and from influencing any sanctioned USA Rugby-related events.

ii. **Prevent Intimidation and Retaliation:** Prohibit Defendants from intimidating or retaliating against Plaintiff for exercising his rights to contract

and participate in rugby events, including any future threats or actions that aim to restrict Plaintiff's professional opportunities.

- m. **Declaratory Relief:** Declare Defendants' actions to be in violation of Plaintiff's rights under applicable contracts, the Ted Stevens Act, and other relevant laws.
- n. **Revocation of Title:** Direct the revocation of Defendant Jamie McGregor, acting on behalf of and at the direction of USA Rugby's World Rugby Educator title and any other professional or honorary designations related to rugby officiating or training.
- o. **Ongoing Monitoring:** Plaintiff requests measures to ensure ongoing compliance with any ordered remedies, including regular reporting or audits to confirm adherence to the court's orders.
- p. **Legal Fees and Costs:** Award reasonable attorney's fees, legal costs, and expenses.
- q. **Any Other Relief:** Award any other relief deemed just and proper.

VI. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Plaintiff Justin X. Hale respectfully requests the Court award damages, injunctive relief, and any other appropriate relief necessary to address and rectify the harm caused by the actions of Defendants Jamie McGregor and USA Rugby.

Respectfully,

Justin X. Hale
107 Grapefruit Rd.
(979) 703-0894
September 11, 2024
justinxhale@gmail.com

EXHIBITS

(Exhibit A) Official CRRA Invite

College 7s championships > Inbox X

Nick Ricono <nicono@usa.rugby>
to Jamie ▾

Sat, Mar 18, 3:10 PM ☆ ↵ ⋮

7s Refs,
You would
Please let
Thanks very
Nick Ricono
USA Rugby

from: Nick Ricono <nicono@usa.rugby>
to:
cc: Jamie McGregor <jmcgregor@usa.rugby>
date: Mar 18, 2023, 3:10 PM
subject: College 7s championships
mailed-by: usa.rugby
signed-by: usa-rugby.20210112.gappssmtp.com
security: ⓘ Standard encryption (TLS) [Learn more](#)
↳: Important according to Google magic.

ships in Houston, TX the weekend of May 6, 2023.
ing. USA Rugby will cover travel and hotel and provide a stipend.

College 7s championships > Inbox X

Nick Ricono <nicono@usa.rugby>
to Jamie ▾

Sat, Mar 18, 3:10 PM ☆ ↵ ⋮

7s Refs, I'm happy to invite you to referee at this year's College 7s Championships in Houston, TX the weekend of May 6, 2023.

You would arrive Friday evening and depart Sunday evening or Monday morning. USA Rugby will cover travel and hotel and provide a stipend.

Please let me know if you are available and I will forward details for travel.

Thanks very much and looking forward to seeing you all soon!

Nick Ricono
USA Rugby 7s Referee Manager

Justin <justinxhale@gmail.com>
to Nick, Jamie ▾

Sat, Mar 18, 5:05 PM ☆ ↵ ⋮

Available. Will drive from Austin.

Nick Ricono <nicono@usa.rugby>
to me ▾

Sat, Mar 18, 6:43 PM ☆ ↵ ⋮

Great thanks Justin

On Mar 18, 2023, at 3:05 PM, Justin <justinxhale@gmail.com> wrote:

You're welcome! Looking forward to it! My pleasure.

(Exhibit B) Phone Call Transcript

Jamie McGregor (00:00):

I, I've got a bit of bad news for you. Um, I, I understand. I, I think you were in, uh, you were out on, in the East coast for the CRCs on the weekend. Is that right? Yeah. All right. So I mean, you, I'm assuming that you would know that that means when we, we can't use you for the c r a tournament this weekend, right?

Justin X. Hale (00:21):

Mm, no, didn't, didn't assume that.

Jamie McGregor (00:25):

Okay. Um, so as you would know, cause I mean, I know that you, you followed some of this stuff with NCR, um, you know, you know, that was an NCR tournament that was being played, right? Yep. Yeah. So this is c r a and as you would know, would know from following stuff, you know, that tournament was not sanctioned. It, it, it, um, and, and referees who were part of that tournament can't then be used in the other college stuff based on the agreements that we've got with the different college organizations. So, um, I'm, I'm sorry if that wasn't told to you by, um, the CRCs guys. Um, you're not the first person to have been burned by them by making that clear. They, they definitely know that that's the case. Um, and oftentimes they don't tell referees that that is the case. Um, and, uh, it's very upsetting for us that when they kind of get people along on false pretenses. But, um, that's just kind of the, the, the way that that goes. Um, you would've noticed that none of the other referees, you know, the Ciscos, the cats, the Jacobs, the Alex, you know, there, there were none of the other referees at that tournament. And that's, that's why, um, so, uh, I I, I, this is absolutely shitty and I hate to, uh, be the bear of bad news on that front, but, um, we're, we're just not in a position to be able to use you for the C.R.A.A Champs. Does, does that make sense?

Justin X. Hale (02:00):

No, it don't make sense, but I hear you. I don't, it, it, it's fucking stupid. But I hear what you're saying, so, no, it does not make sense, but I hear you.

Jamie McGregor (02:08):

Yeah. I mean, the whole thing doesn't make sense, um, in the sense that I, I just wish these people could get their together and, and, uh, and, and work their problems out. Um, but

Justin X. Hale (02:21):

As it's, yeah, but it's now, it's not them that's saying I can't do it. It's USA rugby. So, um, that's, that's a, that's a little untruthful on your, on your end, in my opinion. But, um, okay. I, like I said, I, I hear you. I, you're <laugh> it, it, it doesn't matter. It, it, it, it, it doesn't matter cuz it's not gonna change anything.

Jamie McGregor (02:42):

No, it's not gonna change anything. But I, I mean, I do want you to understand where I'm coming from, and I, I don't want you to think that we are being untruthful or unfair from our, our perspective. So, I mean, I'm at your disposal to answer any questions that you've got about why we're in this position or what, what's happening between the two organizations and all that kind of stuff. If you have, if you have any questions, ask me. Uh, cause I'll give you a straight answer.

Justin X. Hale (03:06):

Yeah. Well, my one biggest issue is this has never been put in writing for me as a referee, um, ever. So that, that tells me that this is a, a more disingenuous conversation than, than anything else because nobody, everybody refuses to put what you just said in writing, which is a huge issue. Um,

Jamie McGregor (03:31):

Oh no, it's, it's definitely been put in writing and sent to all the referee societies.

Justin X. Hale (03:35):

Okay. Well, I'm, I'm, it's l i i, I don't believe it may, maybe we've thought we've seen it out to everybody, but the, the, the level of activity I have in my society, and I've never gotten that information. Never. Um,

Jamie McGregor (03:52):

So I'll send you a copy of the document that's gone through the R L C that's been sent to every referee society, including Lone Star, and was sent at the end of last year about the split between NCR and, and, um, uh, and, um, the college council and the, the, what, what are the consequences of referees to referee unsanctioned rugby, um, and what, what, what are, you know, what it all entails. Happy to send that to you.

Justin X. Hale (04:23):

Yes, please. Uh, yeah, please do.

Jamie McGregor (04:29):

Okay. Anything, yeah. Any other, no,

Justin X. Hale (04:32):

It's just, yeah, it's, it's just crap because we're not employees of anybody and we're 10 99 and Yeah. And we can, yeah, it, it doesn't matter. It doesn't matter. I'm not gonna put out my frustration. Um, no.

Jamie McGregor (04:45):

Hey, to be honest, I'm here for you to, to take out your frustration on, right? I'm the person making the call. Feel free to vent your frustration if you want to, or ex explain what the situation is. I mean, you, you know that there's the, there's the schism between the two organizations, right?

Justin X. Hale (05:00):

Yeah. Yep.

Jamie McGregor (05:02):

Right. And you know that, you know, that other referees are not referring, you know, CRCs or going to CRCs or refereeing that kind

Justin X. Hale (05:08):

Of No, for, for the, the people I talked to that weren't going was specifically cuz they wanted to get their, um, they were doing regional competitions and they, and they really wanted to do those regional competitions. Um, none, none of the, none of the people that, that you listed that I talked to, uh, mentioned it because of that reason. So, um, okay.

Jamie McGregor (05:31):

And no one, no one at CICS told you that?

Justin X. Hale (05:34):

Nope. Nope. And it, what I tell you what, what makes it even more confusing is when you have referee coaches that, that also do both events, right? Uh, and so, uh,

Jamie McGregor (05:47):

For example,

Justin X. Hale (05:49):

Uh, for example, like Terry told me he'll be in, in Houston next week cause he said, can't wait to see you in Houston. Uh,

Jamie McGregor (05:55):

Yes. So Terry is also getting a phone call today. Yeah.

Justin X. Hale (05:59):

So, uh,

Jamie McGregor (06:01):

Terry knows the situation. Terry told us point blank, he didn't care. And so Terry is getting a phone call the same way you are.

Justin X. Hale (06:10):

Okay.

Jamie McGregor (06:10):

So Terry will not be in Houston.

Justin X. Hale (06:13):

Okay.

Jamie McGregor (06:18):

Um, I, I know this is. Um, and it, it just, and if the, the thing that I think is the most frustrating from my point of view is USA Rugby is not in a position to get its side of the story out because it, it doesn't do negotiation and, and, and public information via Facebook post, right? So I get a lot of referees coming to me and saying, Hey, N c I posted this thing on Facebook, you know, they said, oh, we've, we've done this and we've done that. Most of which is untrue. But USA Rugby is not in a position to put out a Facebook post, you know, to try and argue these kind of things. These are all legal matters. They all go through, they all go through lawyers, you know, us Arab is an actual, you know, we're an actual thing.

Jamie McGregor (06:58):

We're a union. We belong to world rugby, we have responsibilities. We, we can't be fighting this kind of stuff via Facebook post, right? And so we get a lot of people saying, oh, well, US Arab doesn't communicate or doesn't tell us this, that, or whatever. And the answer is where we're, we're kind of, um, in a position of fighting what with one hand how it tied behind our back, right? Because we, we can't do the same stuff that NCR is able to do in terms of just, you know, writing stuff, um, and telling people what they, what their side of the, of the picture is. Um, because, you know, as you can imagine, USA rugby can't, can't, can't conduct legal discussions via social media. You know, that's just not the way that it works if you're in, if you're an actual reunion, right? So, um, that, that is the frustrating thing for me because I see a lot of referees saying, well, we're only getting information from one side, or this is what we're being told and this is what, you know, these are, these are the, this is, these are the people that are really trying to grow the game or whatever it might be.

Jamie McGregor (07:56):

And, and there isn't an opportunity for us to get the, um, the other side of the picture out or, or correct some of the misinformation that's that's out there, which is, and that's frustrating for me. And I imagine it'd be frustrating for the referees who, who kind of caught in the middle. Um, I don't know if that makes any sense, but, um, it, it, it, that's, if you've ever got any questions about why this is the

case, what, what is the, how has this come to pass? What is the actual issues that, that, that are between the two organizations? I'm happy to give you as much information as I can.

Justin X. Hale (08:25):

Yeah. Well, you know, if it's not information that that can be public, then, then I, I'm probably not privy to the information. So it's, it's, it's, yeah, it's, it's no big deal. Just a man in the middle. So it is what it is. We're

Jamie McGregor (08:39):

All we Yeah. And, and look, I'm not gonna pretend like, you know, I, I've got a job to do. I, I mean, it's the first thing to say, it's not really a USA rugby thing, it's a college council thing, right? Because after the, the bankruptcy college, um, the, the, uh, geographic unions and the CS at youth and high school run run their own organizations. So we, we effectively are here to kind of help facilitate that and support them. Obviously the college council is part of US USA rugby, that's voluntary, and c r is not, um, so, you know, this is, this is c a and so from their perspective, they don't want, which I, I understand, but they don't want at their tournament, people who are supporting, you know, an organization that wants them to basically not exist. And, and, you know, they, you know, <laugh>, NCR sued to stop USA Rugby and, and the college council's existence, right?

Jamie McGregor (09:35):

You know, this is, this is this organization wanted to kill us, basically. And so the, their attitude is, well, anyone that's kind of helping them out or giving them oxygen or, or, or support and assistance, um, you know, that they don't wanna be involved in, you know, they don't wanna have those people involved in their tournaments as well, right? So that's their attitude, which is frustrating for me because, you know, I'm, I come from a place where this is just not an issue. The, the, you know, every, every game of rugby in Australia are sanctioned is not even, it's not even a question. It's not even a, it's not even a thought bubble, you know? It's just, yes, this is the governing body, this is the, this belongs to world rugby. We wanna be part of rugby. I've never come across an organization that doesn't want to be part of rugby, right?

Jamie McGregor (10:16):

That just wants to do its own. Welcome to the USA, I suppose. But, um, uh, you know, it's, it's, uh, I dunno why the two organizations can't get together and just sort them out. Um, uh, you know, I know that there are, um, you know, sticking points and it's all got to do with money and, and, and, you know, I I I suspect people's pride on both sides at this particular point, but, um, I wish this was not an issue and I wish I wasn't having to have this conversation to be honest. Yep, I hear you. Yeah. So look, the, the, the number one thing I would say is, um, that from our perspective, this is, and, and the reason I'm having this phone call, and you will certainly not see it like this, and I totally understand that if that's the case, but for me, this is, this is an initial fairness to the referees that, and I know you say you haven't spoken to anyone that hasn't gone, but I can tell you there were a whole bunch of referees

that didn't, that would've liked to have gone to the, to that tournament, but didn't, because it's not sanctioned.

Jamie McGregor (11:16):

And so it's particularly, and I, I, I just feel it's unfair to them if we allow referees, you know, to, to do both without any issue when they went, you know, they did the right thing. They chose not to go to the tournament, they're doing sanctioned rugby only if they are expecting us to, to, to, um, you know, support their development or support with coaching or fund for their attendance or whatever, whatever else it might be, to, to different events. So where U s A rugby is trying to support or run or assign people to various different events and things, then, you know, we, um, uh, you know, that then we, we are gonna support the people who support us. It's basically,

Justin X. Hale (11:55):

Yeah, but well, you're gonna, you're gonna have support the people that support you because at the end of the day, at, at the end of the day, I pay dues to both society. I, I, I held all my, all my games. Most of 90% of my games I've had this year are NCR games because the, uh, I don't get enough club rugby games with within my society. So, um, you know,

Jamie McGregor (12:20):

So we have, what we've said is, what we've said is around NCR matches. Like, so for example, um, things like what we have said is we are not going to go hunting. Like I'm, I'm not gonna go looking into everyone's, um, uh, you know, especially for some people in the Northeast. We are not going to a one off NCR game here or there, or college or whatever it is that that's one thing. But you know, for the people that turn up at national championships and are on television and supporting NCR in that sense, like, it, it just puts us in a very difficult position. We can kind of try and be as reasonable as possible to people who are in an area where they, um, you know, so I I'm still a, we we would've appointed you, um, you know, even though maybe you've been doing some NCR matches appointed by Lone Star or what, whatever it might be. I mean, we should launch,

Justin X. Hale (13:17):

Which, which is my society, um, yeah. <laugh> within

Jamie McGregor (13:19):

Your society. Yeah, we should probably not, but we would've done it anyway. But there's just a, a difference between that and, you know, running out on tv supporting their national championships, right? And the same has been true of referees who have gone, cuz they've, he held like their, you know, their fifteens national championships in Houston previously. So there's been a couple of referees that have, that have, that have done that have done that. And we've had to say, look, I'm sorry, we can't use you for the next event. Um, you know, you and, and a lot of them, you know, I mean, I think have been, you know, look, I don't want to cast dispersions, but, but you know, NCI knows exactly what

the situation is and they, they know that referees that they, I mean, why do you think they went to Canada, right?

Jamie McGregor (14:04):

They've went to Canada to ask a bunch of referees to attend because they couldn't get enough referees here because people are not willing to put themselves at risk of doing unsanctioned rugby, right? Because we just don't know, you know, if there's an, if, if a neck gets broken right in one of those matches, you know, you have no backing from us. You have no backing from world Rugby, you have no backing from anyone. Now NCR says, oh, we have insurance, but that hasn't been tested. You know, because what qualifications do you have? NCR doesn't run any qualifications. They don't have any, um, they don't have, they don't run courses. They don't check that people have got background screening and safe sport and, and, and do all of their stuff. They don't do any of that. They don't require any of their coaches. They don't, they have minimum requirements of the coaches, which currently they require something from USA Rugby to actually, um, and, and it's not even the full amount of what is compliant.

Jamie McGregor (14:58):

So, you know, there's, there's a lot of questions that are yet to be answered. Um, God forbid every anything ever happened to anyone. Um, but anyway, there's, there's a lot of people that are in a position where they are not told what the exact risks are going in. And this is, this is a problem, right? Um, and, uh, I, I'll forward you the document that we've sent to all theros and all the referee societies and, um, it, it was also put on social media I believe as well. So, um, I'll, I'll send it to you. You can have a read of it if you haven't been sent, you should ask Lone star wh why they haven't made sure that all of their referees have it. Um, and have a copy of it if you, if you want. Um, but that's, that at least, we'll, we'll, we'll show you what it, what was put down in writing a, a year or so ago.

Justin X. Hale (15:49):

Okay,

Jamie McGregor (15:51):

Man, I'm sorry, I don't like to have this conversation and I, I, you know, I apologize for being the bearer bad news from that front, but, um, uh, it is what it is. And until the two organizations, the college council and nci, I can sort their out. This is just the reality for us, which is if we're gonna be spending money or we're gonna be supporting people or whatever, you know, if we're gonna put money into people's development, we need to know that they're, they're supporting that organization. So, um, I don't think this is a, by the way, I, I don't think this is a lone star or a T thing. I think it's, it's, you know, Lonestar in good standing with USA Rugby, right? It's a, it's, it's a, this, this is not a lone star T thing. It's a, it's a NCR um, uh, college council thing. So C

Justin X. Hale (16:38):

No, but the, the, the reason I say it's a problem if 90% of my games are, are NCR games during the year, um,

Jamie McGregor (16:48):

It,

Justin X. Hale (16:50):

It's not, it's not like I'm getting USA appointments week, weekend and, and, and week out. So when we talk about development development, it isn't just webinars and coming to courses actually getting a chance to, to referee and, and do high profile matches and, and, and do those type of games. So, um, yeah, so

Jamie McGregor (17:08):

Yeah, well, I mean, we, we, we would've wanted you in Houston, you know? Um, now, I don't know, maybe c honestly, maybe CRCs was a better experience. I don't know. Maybe Houston will be a complete show for CW c a quite frankly, I have my issues with both of those organizations and the way they run <laugh>, they, they way they run their, their stuff. So maybe you got the better of the deal and, and there'll be, and it will have been a better, um, a better tournament for you. So I mean, if, and, and maybe, maybe you get better games out of that, that tournament than you would in this tournament. I, I, I judge, I just dunno. Um, all, all, I, uh, but I, but I do, I do take your point that, um, you know, the, the issue is not just access to information, it's also access to being assigned to stuff.

Jamie McGregor (17:52):

And you know, Nick, Nick likes you as a referee. We want you to be part of stuff. That's why we selected you in the first place. You know, we, we, we want, we want to put time, effort, and development into you. You know, we, we've invited stuff in the past. We, we want to, we want to do that. Um, this is just a situation where, you know, we, we are, we are stuck between a rock and a hard place because N C R last year got their tournament sanctioned. They paid, they, they got sanctioned this year. They said, you we're not doing it. So, okay, fine, but that's, that, that's a situation we're in now, <affirmative>.

Jamie McGregor (18:27):

But, and, and by the way, in case you think, you know, cause I take, I totally take your point about fairness in terms of the referee coaches. So that is, you know, that is something that we have to be consistent on. The same is true of Canada. So Canada is, uh, already going through a process of sanctioning for the referees that left because can Canadian rugby sent all of the referees from Quebec a letter saying that they should not be attending the tournament. And in particular, Michel Nicoletti who was involved with, with refereeing the final, he did not tell the Canadian refer, uh, referee manager that he was going. And, um, and, and they're, they're, they're in some, they're, they're in some strife as well. So this is the, the different, this is not just us being, you know, about the whole thing, although I

can understand entirely how that might be the, how might be perceived that way at this particular point. It's a, it's a serious issue that, well, rugby has to deal with because we can't have unsanctioned rugby, basically. That's the way rugby union works. Um, you know, so anyway, if you've got any, I I don't understand there's a pain, but if you've got any questions about anything, feel free to ask me. I will email you the, the document now.

Justin X. Hale (19:41):

Okay. Thanks Jamie.

Jamie McGregor (19:43):

All right, I'll catch you later. Thanks Justin. Cheers. Bye. Bye.

(Exhibit C) Email to David Wilkerson, MLR

Inquiry Regarding Referee Appointments in MLR



Inbox ✎

Justin <justinxhale@gmail.com>

to dwilkinson ▾

Fri, Mar 15, 12:50 PM



Good morning David,

I hope this email finds you well. My name is Justin X. Hale, and I serve as a referee based out of Austin, TX. I am reaching out to seek some clarity regarding my current status within the MLR referee appointments.

In the previous season, I had the privilege of serving as an Assistant Referee in the MLR, accumulating approximately nine appointments in this role. I am proud to mention that I was recognized as a top AR in Texas for MLR, earning an invitation to the referee's mid-season camp—a testament to my dedication and performance.

Since concluding my last match in the MLR, I have diligently maintained both my physical and mental readiness for the game. In 2023 alone, I officiated over 200 matches, serving as the Center referee or AR. Over 40% of those games involved XV matches. Moreover, I have received positive feedback from the previous referee manager (JK) and Austin Reed, who oversaw the West ARs.

Approximately a month ago, I was pleased to receive a teamwork contact from MLR "USA Referee Starter Pack 2024". However, since then, I have not received any further communication. Regrettably, I have not been invited to any meetings, received appointments, or been provided with any explanation as to why I am not currently involved in the refereeing assignments.

I understand that my tone may come across as blunt, but I am simply seeking clarification as no one from the administrative side of the organization has communicated with me.

I would greatly appreciate it if you could provide me with some insight into my current situation and any steps I can take moving forward.

Thank you for your time and attention to this matter, I am happy to talk on the phone, text, or email

--

Cheers,

Justin X. Hale
(979) 703-0894 - Text Welcomed



David Wilkinson <dwilkinson@usmlr.com>

to me ▾

Fri, Mar 15, 1:20 PM



Hi Justin,

Thank you for getting in touch.

Unfortunately I am currently not in a position to appoint you as an AR to MLR .

Can I suggest you reach out and speak to Jamie McGregor. With my role being across both USA Rugby and MLR I am afraid my hands are tied.

If and when this issue gets resolved, I would be happy to look at your involvement in MLR.

But as things stand I cannot appoint you.

Regards



David Wilkinson, Major League Rugby Director of Match Officials

+44.779.906.2813 | dwilkinson@usmlr.com | usmlr.com



Justin <justinxhale@gmail.com>

to David ▾

Fri, Mar 15, 2:32 PM



Thank you for the transparency David and the speedy response. I'll work on figuring out what issue is going on. Interesting enough this past New Year's I did a 2day AR presentation for USA rugby.

Hope to meet soon.

Cheers,

Justin X. Hale
(979) 703-0894- text welcomed



David Wilkinson <dwilkinson@usmlr.com>
to me ▾

Fri, Mar 15, 2:57 PM



No problem Justin.

Apologies.

Speak to Jamie and hopefully you can get it sorted and get back in MLR.

Wilko



David Wilkinson, Major League Rugby Director of Match Officials
+44.779.906.2813 | dwilkinson@usmlr.com | usmlr.com



...

(Exhibit D) Email to Nick Riccono and Phone call log



Justin <justinxhale@gmail.com>

7s season

Justin <justinxhale@gmail.com>
To: Nick Ricono <nricono@usa.rugby>
Bcc: marquiseagoodwin@gmail.com

Fri, Jun 28, 2024 at 3:59 PM

Hi Nick,

I hope all is well. I heard that invites for Club 7s went out yesterday. Initially, I thought this email might be our invitation back to nationals. I wanted to confirm if I was not invited, and if so, could you please let me know why? Is there something I need to show or do still? I also have footage of me refereeing the USA 7s vs Japan 7s National teams from this past week too if you need to see more recent film than bloodfest 7s.

Thank you,

Justin X. Hale
(979) 703-0894 - text welcomed

Cheers,

Justin X. Hale
(979) 703-0894- text welcomed

On Mon, May 13, 2024, 3:05PM Nick Ricono <nricono@usa.rugby> wrote:

Hi refs, we had a great kickoff for Women's College 7s last weekend. Unfortunately Men's College 7s was cancelled due to teams opting out at the last minute. PR7s was pushed to October. So our next national event will be Club 7s on August 10 weekend again in Madison. Before that we'll be cheering on Kat and Cisco in the Olympics!

Stay active this summer in your regional comps and qualifiers. Let me know if you need any contacts.

Here is a link to video review form for 2024.

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2024 7s Match Reviews
docs.google.com

Send links or clips if you have any questions or things you'd like to discuss. I'll put a whats app group together.

Thanks all!
Nick Ricono



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🔋 🔁 ⚡ 51% 🔋



Nick Ricono

+1 858-735-7083



Monday, July 1



2:00 PM

Outgoing call, 7 mins 37 sec



1:58 PM

Missed call